

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:22CR0062 (HEA)
HUSSEIN KADHIM ABOOD KHALAF,)	
)	
Defendant.)	

GOVERNMENT'S MOTION FOR LOCATION MONITORING

Comes now the United States of America, by and through its attorneys, Sayler Fleming, United States Attorney for the Eastern District of Missouri, and Colleen Lang, Assistant United States Attorney for said district, and files its motion to add location monitoring as a special condition to the defendant's supervised release.

1. Defendant Khalaf was sentenced today in the above-caption matter to time-served and one year on supervised released. The Victim in this matter is very afraid of the defendant. He pled guilty to blackmailing her. Further, at the sentencing hearing today, the defendant was very disrespectful of the victim, denied doing anything wrong, and attempted to lay the blame on someone else. Based on his erratic behavior today and his statements in Court after the Victim's impact statement, the Government does not believe that the defendant understands the true nature and gravity of this matter. Further, the defendant is a flight risk as he is not a citizen of the United States and has no legal status in this country at this time. The Government believes that due to his illegal status and his unwillingness to take

responsibility for his actions, that the defendant will not obey by the current supervised release conditions as they stand and location monitoring needs to be added special condition of his supervised release.

Wherefore, the Government respectfully requests for the Court to order location monitoring (in particular a GPS ankle bracelet) to the defendant's conditions of supervised release.

Respectfully submitted,

SAYLER FLEMING
United States Attorney

s/ Colleen C. Lang
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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Colleen C. Lang
COLLEEN C. LANG, #56872MO
Assistant United States Attorney

